

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INDICTMENT

-v- :

S31 06 Cr. 08 (LAK)

DANNY LEO, :

a/k/a "The Lion," :

JOSEPH LEO, :

a/k/a "Joey," and :

JOSEPH A. TRICARIO, :

a/k/a "Joey," :

a/k/a "Anthony Tricario," :

Defendants. :

- - - - - x

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED JUL 30 2007

COUNT ONE

The Grand Jury charges:

1. From in or about 2002, up through and including on or about November 30, 2006, in the Southern District of New York and elsewhere, DANNY LEO, a/k/a "The Lion," JOSEPH LEO, a/k/a "Joey," and JOSEPH A. TRICARIO, a/k/a "Joey," a/k/a "Anthony Tricario," the defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to make extortionate extensions of credit, as that term is defined in Title 18, United States Code, Section 891, to wit, three separate loans of \$50,000 each to Victim-1, the owner of a livery car business, in violation of Title 18, United States Code, Section 892.

(Title 18, United States Code, Section 892)

COUNT TWO

The Grand Jury further charges:

2. From in or about 2002, up through and including on or about November 30, 2006, in the Southern District of New York and elsewhere, DANNY LEO, a/k/a "The Lion," JOSEPH LEO, a/k/a "Joey," and JOSEPH A. TRICARIO, a/k/a "Joey," a/k/a "Anthony Tricario," the defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to use extortionate means to collect and attempt to collect extensions of credit as that term is defined in Title 18, United States Code, Section 891, and to punish a person for the nonrepayment of such extensions of credit, to wit, LEO and others threatened Victim-1 with physical violence and other harm if he did not make prompt repayment of various loans and other debts, in violation of Title 18, United States Code, Section 894.

(Title 18, United States Code, Section 894)

COUNT THREE

The Grand Jury further charges:

3. From in or about 2002, up through and including on or about November 30, 2006, in the Southern District of New York and elsewhere, DANNY LEO, a/k/a "The Lion," JOSEPH LEO, a/k/a "Joey," and JOSEPH A. TRICARIO, a/k/a "Joey," a/k/a "Anthony Tricario," the defendants, and others known and unknown,

unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, to wit, Victim-1, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, LEO and others threatened Victim-1 with physical violence and other harm if he did not make prompt repayment of various loans and other debts, in violation of Title 18, United States Code, 1951.

(Title 18, United States Code, Section 1951)

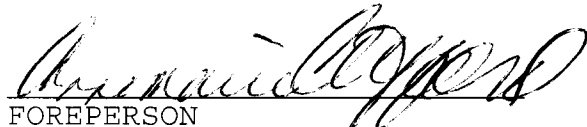
COUNT FOUR

The Grand Jury further charges:

4. From at least in or about January 2003, up to and including in or about January 2006, in the Southern District of New York and elsewhere, DANNY LEO, a/k/a "The Lion," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by

obtaining money and property from and with the consent of two other people, to wit, the owners and operators of an illegal gambling business involved in interstate commerce ("Victims-2 and 3"), which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, LEO and other members and associates of the Genovese Organized Crime Family, agreed to use threats of economic harm and violence to force Victims-2 and 3 to make payments to a member of the Genovese Organized Crime Family, in violation of Title 18, United States Code, Section 1951.

(Title 18, United States Code, Section 1951)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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~~§ 29~~ 06 Cr. 08 (LAK)

§ 31

INDICTMENT

MICHAEL J. GARCIA

United States Attorney.

Brennaie Clifford

7-30-07 Filed Indictment.
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U.S.M.J